

From: Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]
Sent: 6/13/2018 12:49:27 AM
To: Curtis, Jennifer [Curtis.Jennifer@epa.gov]
Subject: RE: Potential North Slope Air Issues

Hi Jennifer. Please see my changes, below.

Remote incinerators

In 2013, EPA promulgated final standards addressing criteria and hazardous air pollutant emissions from Commercial and Industrial Solid Waste Incineration (CISWI) units, including Small Remote Incinerators. In January 2017 ~~late 2016~~, EPA published ~~released~~ a proposed Federal Plan for older, existing ~~these~~ units in Alaska in response to a court order, which, among other changes, would eliminate rule exemptions available to facilities nationwide, but which were especially utilized in Alaska. EPA already finalized similar changes for new units in June 2016. A 2018 budget rider sponsored by Senator Murkowski prohibits EPA from finalizing the proposed rule changes or enforcing on non-compliance for this year. However, ADEC does not have this flexibility and has to revise air quality permits as they come in for renewal and enforce based on existing federal requirements.

Ex. 5 Deliberative Process (DP)

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Methane reporting rule

OOOOa is an air quality rule for the Oil and Natural Gas Sector, requiring air pollution reduction of greenhouse gas emissions and volatile organic compounds (VOC's), such as fugitive emissions at well sites and compressor stations, and from other various equipment used in the sector. In June 2017, the Administrator signed a proposal to stay the rule for two years, while the Agency solicits public comment and reconsiders the rule for several issues. One issue of particular interest for Alaska oil and gas sector is monitoring and reporting requirement that, they argue, is difficult to comply with in the Arctic environment due to location, equipment limitations and frequency of monitoring.

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From: Curtis, Jennifer
Sent: Thursday, June 07, 2018 7:56 AM
To: Pavitt, John <Pavitt.John@epa.gov>
Subject: Potential North Slope Air Issues

Hi John,

I am putting together a really high level "issues" list in preparation for the Forsgren trip. Below are the air-related issues that I anticipate may come up during gourd trip to the Slope and eating with industry. While I am not looking for much in the way of detail, I do want to provide enough information at his time to make sure these issues are at least on the radar of folks patriating. When you get a minute, can you add/edit as you see necessary? Chris Hladick will have an Air/RCRA briefing immediately before the trip but Lee Forsgren will not, so what we provide for him may be it. Thank you!

Remote incinerators

In 2013, EPA promulgated final standards addressing criteria and hazardous air pollutant emissions from Commercial and Industrial Solid Waste Incineration (CISWI) units, including Small Remote Incinerators. In late 2016, EPA released a

proposed Federal Plan for these units in Alaska in response to a court order. A 2018 budget rider sponsored by Senator Murkowski prohibited EPA from enforcing on non-compliance for this year. ADEC does not have this flexibility and has to enforce based on existing federal requirements. Industry supports the development of a rule that reflects the operating challenges in the Arctic environment and the impacts associated with the alternative (storing and shipping waste periodically to a permitted landfill).

Methane reporting rule

Ex. 5 Deliberative Process (DP)

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